

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

H.B.,

Plaintiff,

v.

RED ROOF INNS, INC. et al.,

Defendants.

CIVIL ACTION FILE

NO. 1:22-cv-1181-JPB

**PLAINTIFF'S RESPONSE TO DEFENDANTS' MOTION TO EXCLUDE  
EVIDENCE OF ECONOMIC DAMAGES**

Plaintiff seeks general, noneconomic damages, including past, present, and future physical and mental harm and pain and suffering, and punitive damages under the civil-liability statute of the Trafficking Victims Protection Reauthorization Act (TVPRA), 18 U.S.C. § 1595(a). Doc. 166 at 19–20. Plaintiff does not seek economic damages and therefore does not oppose Defendants' motion.

Respectfully submitted on October 28, 2024.

ANDERSEN, TATE & CARR, P.C.

*Rory A. Weeks*

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## CERTIFICATE OF COMPLIANCE

Pursuant to Local Rules 5.1(C) and 7.1(D), I hereby certify that the foregoing filing complies with the applicable font type and size requirements and is formatted in Times New Roman, 14-point font.

Respectfully submitted on October 28, 2024.

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## CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will automatically send email notification of such filing to the attorneys of record.

Respectfully submitted on October 28, 2024.

ANDERSEN, TATE & CARR, P.C.

*/s/ Rory A. Weeks*

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